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April 25, 1997

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Ms. Cindy Wakat
Chief
Contracts Management Section (SM-5J)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Cindy:

Subject: COI Review for the Outboard Marine
Corporation/Waukegan Coke (OMC) Site
in Waukegan, Illinois, Contract No. 68-W6-0025

This letter is in response to your request for CH2M HILL to provide a review of possible conflict of interest (COI) at the Outboard Marine Corporation/Waukegan Coke (OMC) Site in Waukegan, Illinois. The purpose of our review was to check for COI in anticipation of a potential upcoming RAC Work Assignment.

CH2M HILL COI Review

The U.S. EPA identified three PRPs for the Outboard Marine Corporation/Waukegan Coke (OMC) Site, Outboard Marine Corporation, North Shore Gas Co. (Peoples Gas, Peoples Light and Coke Company, and Peoples Energy Corporation), and General Motors. CH2M HILL has not worked at this site for any of the PRPs. CH2M HILL has worked at this site for U.S. EPA under the REM/FIT contract in the early 1980s.

Based on review of our client cross reference list, CH2M HILL has worked for General Motors. For the 5-year period of 1992 through 1996, CH2M HILL has worked on three projects for General Motors. The assignments, annual revenue from these assignments, and the general types of efforts are summarized on Attachment A.

Some project work for General Motors has been in U.S. EPA Region 5, specifically Michigan. The total revenue from 1992 through 1996 from General Motors has been about \$27,000.

Based on the review of information on past work since 1992 for the PRPs identified by the U.S. EPA at the Outboard Marine Corporation/Waukegan Coke (OMC) Site, CH2M HILL does not recognize a conflict of interest relative to a RAC WA for this site.

E&E COI Review

As subcontractor to CH2M HILL under RAC, Ecology and Environment, Inc. (E&E) also performed a COI review relative to the Outboard Marine Corporation/Waukegan Coke (OMC) Site. E&E has not worked for the PRPs listed by U.S. EPA at the site or on other projects. E&E did not detect any coincidences associated with the site (except as noted below) or the listed PRPs. E&E did not find any facts or circumstances that they believed would present an actual or potential conflict of interest.

E&E did work for U.S. EPA at the site. E&E did perform a site inspection (SI) in 1980 and an HRS scoring in 1982 under Field Investigation Team contracts for U.S. EPA at the Outboard Marine Corporation/Waukegan Coke (OMC) Site. Because this work was performed for U.S. EPA, it is not considered as a conflict of interest. This information is provided in the interest of full disclosure.

I trust that this letter adequately addresses the COI review for CH2M HILL and our RAC 5 subcontractor that you requested. If you have any questions on this information, please call me.

CH2M HILL

Sincerely,



Alpheus Sloan
Program Manager

Attachment

c: Stephen Nathan/PO/U.S. EPA
Peggy Hendrixson/CO/U.S. EPA
Dan Sewall/E&E

Attachment A
CH2MHILL Conflict of Interest Review
at the Outboard Marine/Waukegan Coke (OMC) Site

Year	Company	Number of Assignments	Total Income	Comments
1992	General Motors	0	\$0	None.
	SUBTOTAL	0	\$0	
1993	General Motors	0	\$0	None.
	SUBTOTAL	0	\$0	
1994	General Motors	1	\$4,850	Technical consulting for automotive dealer in CO.
	SUBTOTAL	1	\$4,850	
1995	General Motors	1	\$200	Technical consulting for automotive dealer in CO.
	SUBTOTAL	1	\$200	
1996	General Motors	2	\$21,900	SARA 313 reporting and environmental compliance audit in MI.
	SUBTOTAL	2	\$21,900	
1991 - 1996 TOTAL		NA	\$26,950	
Average Annual Income			\$5,390	
Average No. of Assignments		1		